

05cv823***

Rique Reynolds

26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR PRODUCTION

REQUEST NO. 1:

1. All grievances, complaints, or other correspondence relating to, regarding or arising out of the incidents alleged in the Amended Complaint, including, but not limited to, all grievances or complaints submitted by each Plaintiff to Department of Correction personnel, responses thereto, and any related correspondence between each Plaintiff and Department of Correction personnel.

REQUEST NO. 2:

2. All correspondence relating to, regarding or arising out of the incidents alleged in the Amended Complaint, including, but not limited to, any correspondence between friends or family members of each Plaintiff or other inmates and Department of Correction personnel.

REQUEST NO. 3:

3. Any statements, declarations, petitions, or affidavits relating to, regarding or arising out of the incidents alleged in the Amended Complaint and any statements, declarations, or affidavits of each Plaintiff, other inmates, or witnesses to the allegations in the Amended Complaint.

REQUEST NO. 4:

4. Any tests, reports, studies or any other documents relating to, regarding or arising out of the incidents alleged in the Amended Complaint.

REQUEST NO. 5:

5. All criminal history records for each Plaintiff from any other state besides Delaware for the past 15 years.

REQUEST NO. 6:

6. All medical records for each Plaintiff relating to, regarding or arising out of the incidents alleged in the Amended Complaint.

REQUEST NO. 7:

7. All medical records for each Plaintiff for the past 15 years.

REQUEST NO. 8:

8. Any and all document(s) referenced or identified in Plaintiff's Responses to Interrogatories served contemporaneously herewith.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

~~/s/ Eileen Kelly
Eileen Kelly (I.D. 2884)
Deputy Attorney General
820 N. French St., 6th Floor
Wilmington, DE 19801
(302) 577-8400
eileen.kelly@state.de.us
Attorney for Defendants~~

~~Dated: March 8, 2007~~

5-30-07

DATE

Patricia Reynolds

Rique Reynolds

2. Identify the individual by whom it was made, the individual to whom it was directed, and all individuals present when it was made; and
3. Identify any document in which it was recorded, described or summarized; and
4. Identify any such document sought to be protected.

INTERROGATORIES¹

- 1) With respect to each and every claim in the Amended Complaint:
 - (a) Identify all facts that refute, relate to, or support your contention;
 - (b) Identify the specific behavior or conduct that you allege that each Defendant engaged in;
 - (c) Identify all persons with knowledge of such contention or facts;
 - (d) Identify all documents that reflect, refer to or relate to such contention or facts.

RESPONSE:

I agree to all the facts alleged in the Amended Complaint. that was filed in this matter.

¹ Please submit additional pages, if necessary.

2) Identify all documents which you intend to offer into evidence at the trial of this matter.

RESPONSE:

At this time I have no documents to present.

3) Identify all persons having knowledge of the allegations in the complaint or answer whom you intend to call as witnesses at trial, excluding expert witnesses.

RESPONSE:

At this time I have no witnesses to call.

4) Identify all persons whom you intend to call as witnesses at trial, excluding expert witnesses.

RESPONSE:

At this time I have no witnesses to call.

5) Identify any physical evidence which relates in any way to any of the facts alleged in the complaint or answer, or which you intend to offer in evidence at trial.

RESPONSE:

At this time I have no physical evidence to present.

6) Identify each expert you expect to call to testify as a witness at trial and state for each such expert, (i) the qualifications of the expert, (ii) the subject matter on which the expert is expected to testify, (iii) the substance of the facts and opinions to which the expert is expected to testify and (iv) the summary of the grounds for such opinion.

RESPONSE:

At this time I do not have the funds to attain any expert witnesses in this matter.

- 7) State the following about yourself:
- a. Full name, and any other names you have gone by or used,
 - b. Social Security Number
 - c. Date of birth, and any other date of birth you may have used or given,
 - d. Place of birth
 - e. Highest level of formal education that you successfully completed

RESPONSE:

a - Rique Reynolds

b - 111-62-0224

c - 10-29-65

d - Trinidad, West Indies

e - 14th grade, A.A.S. Degree⁵ - Electrical Engineering Technology

8) Identify all of your criminal convictions in the past 15 years, including the court, jurisdiction, date of conviction, date of sentencing, and the terms of the sentence.

RESPONSE:

*Objection. This request has no relevance to plaintiff's claims.
Rule 26.*

9) Identify all employment you have had in the past 15 years, including the name and address of each employer, name of supervisor, dates of employment, rate of pay, job title and responsibilities, and reason for termination.

RESPONSE: *2001 - 4/2002 - Kitchen Worker , \$35 a month .*

The reason that I left the kitchen were due to the extreme conditions.

10) Identify all physicians you have seen or been treated by in the past 10 years, including name, office address, telephone number, dates of examination or treatment, and the medical problem involved, if any.

RESPONSE:

Objection. I will need to obtain my medical files from DOC.

11) Identify and describe all accidents, injuries and ailments you have had in the past 15 years, including the history of any mental illness.

RESPONSE:

Objection. I will need to obtain my medical files from DOC.

12) Identify in detail the precise injury or harm you allege was sustained as a result of the allegations in the Complaint.

RESPONSE:

<i>Heat Exhaustion</i>	<i>Eye Irritation</i>	<i>Neck Ache</i>
<i>Mental Anguish</i>	<i>Humiliation</i>	
<i>Pain & Discomfort</i>	<i>Embarrassment</i>	
<i>Dehydration</i>	<i>Headaches</i>	

13) Describe any medical treatment you received as a result of the allegations in the Complaint, specifically addressing:

- a. whether you requested any medical treatment at the Sussex Correctional Institution which you believe in any way resulted from the allegations in your complaint; and
- b. the date and method used for any request listed in subparagraph a. of this interrogatory.

RESPONSE:

Given time off from work.

14) State whether you filed a complaint or grievance at the correctional institution or with the Department of Correction about the subject matter of each and every claim in your

Complaint. If so, when were they filed, with whom were they filed, and what was the response?

If not, why not?

RESPONSE:

My name was on the list that was submitted with George Jackson's grievance, because inmates are not allowed to submit more than 1 grievance on a single incident. These are DOC's rules.

15) State the total amount of compensatory damages you are claiming and the computation used to arrive at the sum.

RESPONSE:

\$100,000 minimum to be compensated for each day that I worked under those extreme conditions.

16) Either prior to or subsequent to the alleged incident(s) referred to in the Amended Complaint, have you ever suffered any injuries, illness or diseases in those portions of the body claimed by you to have been affected as alleged in the Amended Complaint? If so, state:

a. A description of the injuries or diseases you suffered, including the date and place of occurrence;

b. The names and addresses of all hospitals, doctors, or practitioners who rendered treatment or examination because of any such injuries or diseases.

RESPONSE:

Objection. I will need to obtain my medical files from DOC.

17) Have you, or anyone acting on your behalf, obtained from any person any statement, declaration, petition, or affidavit concerning this action or its subject matter? If so, state:

- a. The name and last known address of each such person; and
- b. When, where, by whom and to whom each statement was made, and whether it was reduced to writing or otherwise recorded.

RESPONSE:

No, not to my knowledge.

**STATE OF DELAWARE
DEPARTMENT OF JUSTICE**

~~/s/ Eileen Kelly
Eileen Kelly (I.D. 2884)
Deputy Attorney General
820 N. French St., 6th Floor
Wilmington, DE 19801
(302) 577-8400
eileen.kelly@state.de.us
Attorney for Defendants~~

~~Dated: March 8, 2007~~

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DATE

Pi Due Reynolds

CERTIFICATE OF SERVICE

05cv823 ***

I, Rique Reynolds, ~~III~~ CERTIFY that
I FORWARD (1) COPY OF SAID
INTERROGATORIES / PRODUCTION OF
DOCUMENTS, by PLACING in S C T
MAIL box ON MARCH, 30, 2007

TO: EILEEN KELLY
Deputy Attorney General
820 N. FRENCH ST, 6th FL
Wilmington, DE. 19801

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 APR -6 PM 4:05

3-30-07

DATE

Rique Reynolds

